

SCHEDULE DELAYS

Primary schedule delays are:

- The Draft and Final OU 6 Work Plans were delivered to the EPA on the IAG scheduled delivery dates of April 19, 1991, and September 16, 1991, respectively. Revisions to the Final Work Plan were required by the EPA and CDH. This resulted in additional work as described in Part 32 of the IAG. An extended due date of December 16, 1991, was specified by the EPA to incorporate those revisions. The revised Final Work Plan was delivered to EPA on schedule. The Final Work Plan was not approved by EPA until February 27, 1992. In accordance with IAG Attachment #2, part I.B.9, implementation of work plan shall not commence before appropriate approvals from the regulatory agencies. The IAG scheduled approval date per the IAG Schedule (backup schedule to IAG) dated August 14, 1990, for OU 6 was October 15, 1991. This resulted in a delay of four and one half months for the approval of the Work Plan.
- IAG assumptions in IAG Schedule (backup schedule to IAG), Tab A, III. A dated August 14, 1990, allowed 41 days for procurement activities. The procurement assumptions has been identified as an inappropriate assumption through numerous discussions and QAT correspondence. The procurement process for the implementation of the Work Plan subcontract was not specified in the IAG schedule. For the OU 6 BOA subcontract the entire procurement cycle, including the preparation of the statement of work, purchase requisition, request for proposal, subcontractor proposal preparation, subcontractor's proposal evaluation, contract negotiations, DOE approvals and contract award required three months.
- An approved Health and Safety Plan (HSP) was required prior to starting field operations. The OU 6 IAG schedule did not include the Health and Safety Plan. The HSP is on the critical path toward the IAG Milestone for the delivery of the RFI/RI Report. Writing the HSP,

ADMIN RECORD

00000 5069

A-DU06-000142

obtaining comments from seven reviewers, incorporating revisions and obtaining approvals required approximately two months.

- Turnaround time at the analytical laboratories has been longer than the IAG scheduled time of 63 work days. Many samples required over 100 days for analysis. Considerable improvement has occurred in this area. The data validation is in progress and is requiring more than the 21 work days scheduled in the IAG. At this time the delays for validation are not expected to add to the extension time requested, providing the Draft RFI/RI Report will be acceptable with unvalidated data.

Other delays that occurred during the same time period follow:

- Compliance with DOE floodplain regulations (10 CFR 1022) took seven months including publication of "Notice of Intent" in the Federal Register. Compliance with floodplain regulations was not in the IAG schedule.
- Compliance with 10 CFR 1022 took one year including publication of the "Statement of Findings" in the Federal Register. Compliance with 10 CFR 1022 was not in the IAG schedule.
- A Categorical Exclusion (CX) for work in a floodplain cannot be approved until 15 days after publication of the Statement of Findings to allow a public comment period. RFO signed the CX on Oct. 20, 1992. A significant portion of the OU 6 field work was required in floodplains and could not have commenced until after the CX was signed on Oct 20, 1992. This is one year past the IAG scheduled start date for field operations (Oct 17, 1991). Although limited field operations could have taken place, the sequencing of work would have been inefficient.
- The endangered Ladies Tresses Orchid was considered to have a potential habitat in many areas of OU 6. Field operations in those areas could not take place until the US Fish and Wildlife Service approved the results of surveys indicating that there were no Ladies Tresses within the OU 6 area. The time frame that this process required was from June 3, 1992 through November 16, 1992 (five months). Contingencies such as this were not in the IAG schedule.

- The FY 93 budget was reduced by OMB for the Rocky Flats ER Program. The effect on OU 6 was the postponement of starting the Human Health Risk Assessment (HHRA). The HHRA is required in the RFI/RI report.
- Cost savings in field operations reduced some of the budget shortfall. However, these savings were not actualized until near the completion of field operations, well into the second quarter of FY93. The result was that the HHRA was delayed by approximately three months. Since the HHRA is on the critical path, the delay in the project is three months. Without the cost savings, the delay would have been six months.
- There is no scheduled review time for the HHRA Technical Memoranda (TM) in the IAG Schedule. The addition of 16 working days of review time that have been requested by DOE for each of the four TMs will add three months to the schedule.